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U.S. Environmental Protection Agency
Region 4 Freedom of Information
SNAFC Bldg, 61 Forsyth Street., S.W., 9th Flr
Atlanta, GA 30303-8960

April 8, 2014

Freedom of Information Act Request

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Jean A. Bice, Retired

RE: James A. Taylor, et al. vs. Afton Pumps, et al.
Broward County Case No: 13-08335

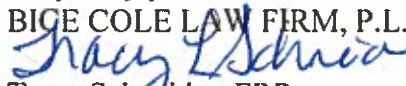
Dear Sir or Madam:

Our firm is involved in the above-referenced case and we are requesting copies of all asbestos abatement records pertaining to the following facilities:

- Georgia Pacific Container Plant in LaGrange, Georgia.
- Proctor & Gamble in Albany, Georgia
- University of Georgia in Athens, Georgia
- Baldwin County Hospital in Milledgeville, Georgia
- Merck Plant in Albany, Georgia

Please see the attached schedule "A" for detail list of the record request. Please forward copies of all documents, fee not to exceed \$100.00. If the cost for duplication and shipping is over that amount, please call my office for further authorization.

Thank you for your prompt attention to this matter.

Very truly yours,
BICE COLE LAW FIRM, P.L.

Tracy Schneider, FRP
Paralegal

/t/s
Enclosure

SCHEDULE "A"

DOCUMENTS REQUESTED

1. Any and all records and documents regarding the use and presence of asbestos-containing products and insulation, including but not limited to boilers, turbines, generators, or pumps from 1967 to 1979.
2. Any and all records and documents regarding the presence of asbestos-containing products and insulation, including but not limited to boilers, turbines, generators, and pumps, which had already been installed but were still present as of 1979.
3. Any and all documents listing or describing the outside or independent contractors and crews that inspected, maintained, repaired, overhauled, constructed, demolished, or built any asbestos-containing products, including but not limited to boilers, generators, turbines, or pumps from 1967 through 1979.
4. Any and all records, documents, and contracts from insulation contractors, crews, and firms that installed or repaired asbestos insulation from 1967 to 1979.
5. Any and all maintenance and repair records, including but not limited to job tickets, certificates, certifications, work orders, schematics, inspection logs, boiler logs, maintenance logs, and personnel logs of asbestos-containing products, including but not limited to boilers, turbines, pumps, or generators from 1967 through 1979.
6. Any and all purchase orders, requisition slips, distribution records, work orders, blue prints, and mechanical drawings regarding the installation of asbestos-containing products, including but not limited to boilers, turbines, pumps, or generators from 1967 to 1979.
7. Any and all purchase orders, requisition slips, distribution records, work orders, blue prints, and mechanical drawings regarding the removal of asbestos-containing products, including but not limited to boilers, turbines, pumps, or generators 1967 to 1979.
8. Any as-built drawings, mechanical drawings, and blueprints showing the location, amount, or use of asbestos-containing materials, including but not limited to boilers, turbines, generators, or pumps from 1967 to 1979.
9. Any and all EPA reports, violations, inspections, warnings, and/or fines for the presence, use, installation, removal, storage, isolation, and containment of asbestos-containing materials from 1967 to 1979.
10. Any and all industrial hygiene reports regarding the extent, absence, presence, amount, type, and/or percentage of asbestos 1967 to 1979.

11. Any and all records, documents, blueprints, diagrams, progress reports, progress payment records, and contracts from all asbestos abatement contractors from 1967 to the present.

12. Any and all workers' compensation records alleging or claiming asbestos-related pulmonary or respiratory injuries 1967 to 1979.